

1 THE HONORABLE BARBARA J. ROTHSTEIN
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8 UNITED STATES DISTRICT COURT
9 WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

10 PHILIP MARTIN, T.F. (NATALIE) TANG,
and YATIN KHANNA, Individually and on
11 Behalf of All Others Similarly Situated,

12 Plaintiffs,

13 v.

14 BINANCE HOLDINGS, LTD. d/b/a
BINANCE, BAM TRADING SERVICES INC.
15 d/b/a BINANCE.US, a Delaware corporation,
and CHANGPENG ZHAO,

16 Defendants.

17 Case No. 2:24-cv-01264

18 **STIPULATED MOTION AND ORDER TO
EXTEND DEFENDANT BAM TRADING
SERVICES INC.'S TIME TO RESPOND TO
PLAINTIFFS' INITIAL COMPLAINT**

19 **I. STIPULATION**

20 Plaintiffs, Philip Martin, *et al.* ("Plaintiffs"), and Defendant BAM Trading Services Inc.
("BAM"), through their undersigned counsel, hereby stipulate and agree as follows:

- 21 1. On August 28, 2024, Plaintiffs served BAM with a Summons and a Complaint.
22 2. Pursuant to Rule 12(a)(1)(B) of the Federal Rules of Civil Procedure, BAM's
current deadline to respond to the Complaint is September 18, 2024.
23 3. The parties, through their respective counsel, have agreed that, pursuant to Local
Rule 7(j), BAM's deadline to respond to the Complaint is extended by thirty (30) days, up to and
including October 18, 2024.

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2 4. The parties submit that good cause exists for the extension agreed to herein, as
3 BAM's counsel was only recently engaged in this litigation. Moreover, the other two Defendants
4 in this action, Binance Holdings Ltd. and Changpeng Zhao, have not yet been served with the
5 Summons and Complaint, and it may be efficient for the Court and the parties to align the response
6 deadline for all Defendants.

7 5. The parties submit that the extension will not unduly delay the progress of this case,
8 as no discovery cut-off or trial dates have been set and no extensions have previously been
9 requested.

10 IT IS SO STIPULATED this 18th day of September 2024.

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Attorneys for Defendant BAM Trading Services Inc.

1 **II. ORDER**

2 **IT IS SO ORDERED.**

3 DATED this 19th day of September 2024.

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6 Barbara Jacobs Rothstein
7 U.S. District Court Judge

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9 Presented by:

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